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May 9, 2018

**VIA ECF**

The Honorable Lewis A. Kaplan  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *Chevron Corp. v. Donziger, et al.*, Case No. 11 Civ. 0691 (LAK)

Dear Judge Kaplan:

I respectfully write as Chevron's counsel about the upcoming schedule. At the conclusion of yesterday's hearing, Your Honor directed the parties to return to court next Tuesday, May 15, to address Chevron's motion to compel discovery from Steven Donziger. I have since reviewed my calendar and now realize I have a long-standing commitment as a member of my law firm's Management Committee to be out of town next week for meetings in our Dallas, Denver and San Francisco offices. I therefore respectfully request that the Court consider rescheduling next Tuesday's hearing to occur, instead, on Monday, May 21, or shortly thereafter. I will, of course, appear whenever Your Honor directs, but I appreciate the Court's consideration of my request, which would enable me to honor all of my commitments in the coming weeks.

Respectfully,

/s/ Randy M. Mastro  
Randy M. Mastro

cc: All Counsel of Record (via ECF)